

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

William J. HAMMONS,  
petitioner,

V.

C.V. Act. No. 05-718-KAJ

THOMAS L. CARROLL,  
WARDEN, AND CARL C.  
DANBERG, ATTORNEY GENERAL  
FOR THE STATE OF DELAWARE

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2006 JUN 30 PM 2:12  
eScanned

Motion For Expert Testimony

Comes now, William J. HAMMONS, in  
presenting THIS motion TO BE HEARD BEFORE  
THIS COURT AT its EARLIEST CONVENIENCE,  
PURSUANT TO F.R.E. Rule 706. IN SUPPORT  
THEREOF THE following is shown:

A) 1. petitioner HAS RAISED A CLAIM OF  
FACTUAL INNOCENCE AND INSUFFICIENT EVIDENCE TO  
SUSTAIN A CONVICTION BASED ON DNA EVIDENCE  
AND HE IS NOT A SCIENTIFIC EXPERT.

2. THERE IS A NEED FOR EXPERT TESTIMONY TO SUPPORT THE FACT THAT DNA EVIDENCE CLEARS THE PETITIONER OF THE CRIME OF RAPE.  
28 USC 2254 (F).

3. upon Courts Finding OR upon motion Filed By petitioner, expert witness CAN BE Court Appointed.

B) 1. petitioner HAS RAISED A CLAIM OF INEFFECTIVE ASSISTANCE OF COUNSEL AND HE IS NOT A MEMBER OF THE DELAWARE BAR ASSOCIATION, NOR HAS HE EVER RECEIVED ANY LAW SCHOOL TRAINING.

2). THERE IS A NEED FOR EXPERT TESTIMONY ON COUNSEL'S PERFORMANCE TO SHOW A CLAIM OF INEFFECTIVE ASSISTANCE OF COUNSEL HAS LEFT AN PERSON WHO IS ACTUALLY INNOCENT INCARCERATED AND THAT COERCION WAS USED TO OBTAIN A GUILTY PLEA. 28 USC 2254 (b)(ii).  
Murray v. CARRIER.

3). upon Courts Finding OR upon motion Filed, expert witness CAN BE Court Appointed.

THEREFORE, Petitioner Respectfully Requests  
THAT upon His good Cause SHOWN, THAT THOS  
Honorable Court Appoint Expert DNA witness  
and Expert Legal witness.

5-19-06

Respectfully Submitted,  
William J. Hammons

CERTIFICATE OF SERVICE

I, William J. Hammons, Hereby  
Certify THAT ON May 19<sup>th</sup>, 2006, I  
PERSONALLY PLACED IN THE D.O.C. MAILBOX  
ONE COPY OF THIS motion FOR  
Expert Testimony TO THE BELOW  
NAMED Respondants.

Elizabeth R. McFarlan, esq.  
Deputy Attorney General  
820 N. French St.  
Wilmington, DE. 19801

William J. Hammons  
William J. Hammons  
166139  
DEL. CORR. Ctr.  
1181 Paddeck Rd.  
Smyrna, DE. 19937

IM William J. Hammond  
SBI# 166139 UNIT 23  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



United States District Court  
District of Delaware  
844 N. King Street, Lock Box 18  
Wilmington, Delaware  
19801-3570

Legat

